

- b) Dismissing Defendants' claims for fraud and consumer fraud for failure to plead fraud with particularity pursuant to Federal Rule of Civil Procedure 9(b);
- c) Dismissing Defendants' claims for declaratory judgment for failure to state a claim pursuant to Federal Rule of Civil Procedure 12(b)(6);
- d) Dismissing Defendants' claim for unjust enrichment for failure to state a claim pursuant Federal Rule of Civil Procedure 12(b)(6); and
- e) Awarding such other relief to which American General may be justly entitled.

DATED: March 9, 2011.

Respectfully submitted,

By: /s/ Christopher Raleigh
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CERTIFICATE OF SERVICE

I hereby certify that on this the 9th day of March 2011 a true and correct copy of the foregoing has been filed through the CM/ECF system. It is my understanding that a copy of the foregoing will be forwarded by email to all attorneys of record in this case.

/s/ Christopher Raleigh

Christopher Raleigh